

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No.
)
 TWENTY-SEVEN THOUSAND,)
 ONE HUNDRED DOLLARS)
 (\$27,100.00) U.S. CURRENCY, and)
)
 ONE 2001 TOYOTA HIGHLANDER,))
 VIN: JTEGF21AX10010029,)
)
 Defendants.)

VERIFIED COMPLAINT OF FORFEITURE

Comes now plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Julia M. Wright, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this in rem civil action the United States seeks forfeiture of certain property, pursuant to the provisions of Title 21, United States Code, Section 881.

2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), and Title 21, United States Code, Section 881. In rem jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Section 1355 & 1395 and Title 21, United States Code, Section 881(j).

3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code, Section 801 et seq., was proceeds traceable to such an exchange, or was used or intended to be used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

5. On or about November 3, 2014, the defendant property was seized from Amy Casillas and Daniel Casillas by the Phelps County Sheriff's Department. The defendant property is more particularly described as follows:

- a) \$27,100.00 U.S. Currency; and
- b) One 2001 Toyota Highlander, VIN: JTEGF21AX10010029

6. On November 3, 2014, officers with the Phelps County Sheriff's Department initiated a traffic stop of a 2001 Toyota Highlander (subject vehicle) pursuant to a traffic violation. The driver was identified as Amy Casillas (Casillas) from Glendale, California, and the passenger was identified as Daniel Casillas (passenger) from Glendale, California. The subject vehicle is registered to Amy Casillas.

7. The officer informed Casillas of the traffic violation and she stated that the vehicle had been in a mechanic shop and she flew from Los Angeles to Ohio to pick it up. She further stated she and her brother had flown to Ohio to pick up the vehicle and return home. She stated she had lent the vehicle to a friend who moved to Ohio the week before. When asked what kind

of mechanical work was done she paused and stated she did not know. When asked the name of her friend to whom she lent the vehicle she stated she could not remember it. The officer asked if there was anything illegal in the vehicle, including large amounts of currency. Casillas replied “no” and said the only cash she had was in her pocket.

8. The office asked for consent to search the vehicle and Casillas refused. Based on the incredulous statements a trained narcotics detection canine was called to the scene, and near the left rear door, the canine alerted to the presence of narcotic odors within the vehicle. A search of the subject vehicle was conducted after the positive canine alert.

9. During the search, one of the officers pulled back the rear cover of the driver’s seat and observed the edge of a vacuum sealed bundle of U.S. currency. The officer pulled back the cover and discovered three bundles of U.S. currency inside the compartment (subject currency). The rear of the seat had been converted into a false compartment where the back panel had an after-market locking mechanism. The passenger seat also had a hidden compartment, but the compartment in the passenger seat was found to be empty. The compartments were controlled electronically by pushing a series of buttons on the dashboard. A further search discovered another hidden compartment behind the climate control panel on the dashboard, which was also empty. The compartment was lined with thin black carpet. The compartment was found to have a hydraulic cylinder that was electronically activated. The cylinder when activated would push the dashboard out and provide access to the compartment. Casillas denied knowledge of the hidden compartments. Daniel Casillas signed a disclaimer form for the currency.

10. When asked about the cash, Casillas stated it was hers and it was about \$17,000. She further stated she had carried it with her when she flew to Ohio.

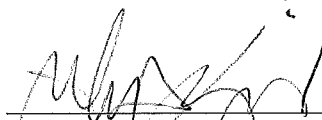
11. The only people known to have any possible interests in the defendant property are Amy Casillas and Daniel Casillas.

12. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant property and the defendant property be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney



JULIA M. WRIGHT, #38928MO
Assistant United States Attorney
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-2200

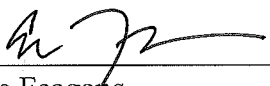
VERIFICATION

I, Task Force Officer Eric Feagans, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Drug Enforcement Administration, that I have read the foregoing Verified Complaint *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Drug Enforcement Administration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 04-21-2015
(date)



Eric Feagans
Task Force Officer
Drug Enforcement Administration